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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

CALDER SEACARRIER CORP.,

Plaintiff,

- against -

07 CV 6520 (LAK)

DECLARATION OF DENG JINJING

VIKING MARINE S.A. and SINORICHES GLOBAL LTD. a/k/a/ SGL SHIPPING LIMITED,

Defendants.	
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- I, DENG JINJING, declare under the penalty of perjury under the laws of the United States that the following is true and correct:
- I am the Director of defendant Sinoriches Global Ltd, ("Sinoriches"),
 (sued herein incorrectly as Sinoriches Global Ltd. a/k/a SGL Shipping Ltd.), and as such am
 fully familiar with the facts stated herein, as well as the allegations alleged in the complaint.
 - 2. The nature of Sinoriches business is marine transportation.
- 3. Sinoriches works with brokers, who act independently and not as agents of Sinoriches, to assist Sinoriches with chartering of vessels. One of the brokers that Sinoriches has dealt with is a Greek company called Sea Pride Maritime.

- 4. In June of 2007, Sea Pride Maritime brokered a charter party between Universal Cargo Lines S.A., as owner, and Sinoriches as charterer for the M/V Vera. Sea Pride Maritime was acting as agent for the owners of the M/V VERA at that time.
 - 5. A copy of the Fixture Recap is attached hereto as Exhibit A.
- 6. Sinoriches never entered into a Fixture Note, or any other type of contract, with Calder Seacarrier Corp. or Viking Marine S.A.
- 7. The alleged Fixture Note negotiated by Sea Pride Maritime and M/S CALDER SEACARRIER was not sent, received, or agreed to by Sinoriches.
- 8. I have read the complaint filed by M/S CALDER SEACARRIER and believe the allegations referring and relating to Sinoriches are false.

Date: _19_ day of September 2007 Dalian, China

EXHIBIT A

recap for changshu cargo

From: Seapride Maritime <seapride@otenet.gr>
To: SINORICHES DALIAN <mail@sinoriches.com>
Subject: Fw: mv vera / sinoriches fixture recap
Date: 2007-6-7 21:47:10

Date: 2007-6-7 21:47:10

SEA PRIDE M A R I T I M E 145 kolokotroni str-185 36 piraeus tel 0030 2104186485/8956521 fax 0030 2108995481 mob 0030 6944657474 Bimco reg nmbr 116552 seapride@otenet.gr

FIXTURE RECAP ON M. TERMS AGREED

Sub stem/shippers/rcvrs to be lifted within tday piraeus cob

chrs :messrs sinoriches global ltd ows:dispows universal cargo lines s.a

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MV VERA (EX ERA)
BC , BLT JUNE'77 JAPAN
                                    DWT 38,931 MTS AT 11,40 MTRS SUMMER DRFT
PANAMA FLAG - LOA:185,363 M , LBPP: 175,00 MTRS , BREADTH: 27,80 M DEPTH: 16,20 M - GRT/NRT 23,353/12,683
4 CRNS X 15 SWL TS, Cranes outreach abt 8,7 mtrs 5 HO/HA, HA COVERS "ERMANS STEEL ROLLING" - TPC GRAIN/BALE: 48.563 / 47.544 CBM, PANAMA GRT/NRT: 25006/18764, CO2 FITTED.
HOLDS CUBIC BREAKDOWN
GRAIN M3
                  BALE M3
                           8442
         1
                                             8244
         2
                           10056
                                             9848
         3
                                             9981
                           10210
         4
                                             9837
                           10045
                           9810
                                             9634
TOTAL G/B 48563/47544 m3 OR IN CBFT: 1,714.990/1,679.000 CO2 FITTED - SUEZ/PANAMA FITTED AUSSIE HOLD LADDER FITTED
DIMS OF HATCHES:
H/1
                - 15.07 × 11.20 M
H/2,3,4,5 - 16.80 X 14.40 M
DIMS OF HOLDS:
 H/1=LENGTH 25,34m = BRDTH F/17,60-21,20m - BRDTH A/26,95m
 H/2=LENGTH/BREADTH (L/B): 27,20/26,95m
 H/3=L/B: 26,40/26,95m
H/4=L/B: 27,20/26,95m
H/5=L:27,20m -BRGDTH F/26,95m -BRGDTH A/22,75-26,75m
 HOLDS HEIGHT: UP TO COMINGS
                                                    - 13.91 M
 UP TO HATCH COVERS - 18.45 M
 TANKTOP CLEAR DEMENTIONS:
 H/1=L/24,65m -BREADTH F/A 10,00/20,80m
H/2=L/B 25,80/20,80m
H/3=L/B 25,30/20,80m
H/4=L/B 25,80/20,80m
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recap for changshu cargo
  H/5=L/26.50m -BREADTH F/20.80m
          BREADTH M/19,60m (In distance of 14,4M fm fore bulkhead-frame NR 54)
          BREADTH A/14,40m
  STRENGTH:
 MAIN DECK
              1,8 t/sq.m -Hcovers 0.2t/sqmtr
 H/1 20,0 t/sq.m -H/2 N 4 16,80 t/sq.m -H/3 21,0 t/sq.m - H/5 17,7 t/sq.m
   =FULLY LOADED WITH DRAFT F/A 11,11/11,76m
   H/1 7,13m;
                  H/5 6,71m A/DRAFT 35,48m
CLASS:R.R.S
IMO NR. 7533109
ADA WOG
-part cgo bss
-1gsb changshu /1gsb ravenna
 owners berth bends n owner to satisfy with themselved both ends
for 20.000/21.000 mt cgo steels prods at chopt
 Prelimitory breakdown:
 5000mt s.plate length:8-12m max weight:15mt;
4500mt s.pipes length:5-11m,o/d:60-180mm,thick:16-30mm;
 5800mt s.pipes in bundles small o/d,length:6-12m;
 2500mt s.coils weigth:7-15mt
 1200mt h-beam length:15m
 sub to know the full packing list of all parcels. pls adv wether in bdls or loose (4500 mt pipes/h-beams)
THE Actual qty to be confirmed one day prior arrival at lport.

-No tiers limitation

-laycan 13/19th june (eta 13th june wp)
-laycan 13/19th june (eta 13th june wp)
-cqd be /detention usd 25.000 dly/prta -detention cl as per previous fixture
 chrs confirming 24 cons hours loading operation shincl
-frt usd 74 per mt or per cbm whatever is greater fios 1sd payable 100pct in usa
curency
 to ows nom bank/acc within 5bd after compl loading.congenbill bs'l to be issued marked 'frt payable as per c/p' fdeosdanrvaoclonl.
-clean bill tobe issue and any remarks in mates receipt to be covered by chtrs loi
 be counter signed by shippers in owenrs pni wording.
 chrs confirming that cgo is a new production and its not rusty or clearly
 damaged. for minor remarks only if any chrs to issue their loi in ows p+i club
 wording counter signed by shippers against issuance of cob bs'l.
-free exins due her age
-ows agents be
-free taxes/dues on frt/cgo
-4w and nor even by cable be
-g.a & arbitration london/english law to apply
-owise gcn 94 with 3.75pct address .owise as per previous fixture 27th april mv
str.attractor
end
pls confirm clean by return
reverting with lport agents nom after the lifting of subs. pls pass the full packing lists. pls adv shippers full style address
brards
nnnn
```

Straight 2 Bank Print Page Close Window



Telegraphic Transfer Printed On 12/07/2007

Status:

Payment Reference: Payment/Value Date:

Debit Date: Input By:

Sub Batch Reference:

Received 00000136

12/07/2007

BEST75

Customer Reference: Batch Reference:

Import Reference : **BO** Reference:

UNIVERSAL CARGO

C0000134

Debit Information

Payment Center:

HK-HKG

Company Name: Debit Account:

OD SHIPPING LIMITED

42900757961

Payee/Beneficiary Information

Payee/Beneficiary ID:

UNIVERSAL CARGO HK-HKG

Payment Center: Account Number:

5114032519273

Bank: Bank Code: PIREAUS BANK S A ATHENS PIRBGRAAXXX

Branch Name: **Branch Code:**

Intermediary Bank Name:

Intermediary Bank Code:

TT Beneficiary Bank

Details:

Payee/BeneficiaryName: UNIVERSAL CARGO LINES S.A.

Address 1: Address 2 :

Address 3: Fax Number: Email ID: Tax ID: Local Language

Information:

Payee/BeneficiaryName: UNIVERSAL CARGO LINES S.A.

Address 1: Address 2 :

Address 3: Address 4:

Payment Details

M/V VERA-SINORICHES FREIGHT

Local Language:

M/V VERA-SINORICHES FREIGHT

Payment Memos

Internal Memo:

External Memo:

Payment Amount

Currency: Gross Amount: Tax & Discount: USD

131,261.13

0.00

Payment Amount:

Payee/Beneficiary

Charge: Net Amount: 131,261.13

0.00 131,261.13

Discount & Tax Details

Discount

Gross Amount:

131,261.13

Type: Rate (%): Discount:

0.00

Total Discount & Tax :

0.00

Charges, Miscellaneo	us				
Local Charges: Me					
Overseas Charges : P	ayee/Beneficiary				
·····			****		
FX Contract Details					
Rate Type :	Not Applicable				
Exchange Rate : Debit Currency :	1 USD				
Debit Currency	000				
Equivalent :	131,261.13	ı			
Contract Number :					
Instruction Codes		Regulatory Reporting			